

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SHEENA M. LEE, Individually and on Behalf of All
Others Similarly Situated

Plaintiff(s)

-against-

B&Z AUTO ENTERPRISES, L.L.C. d/b/a
Eastchester Chrysler Jeep Dodge,

Defendants.

Case No. 1:19-CV-07450

**MOTION FOR EXTENSION OF
DEFENDANT'S TIME TO
RESPOND TO COMPLAINT**

The undersigned counsel on behalf of Defendant B&Z Auto Enterprises, L.L.C. d/b/a Eastchester Chrysler Jeep Dodge hereby moves this Court, on consent of Plaintiffs' counsel, for a brief extension of time from today's deadline, up to and including November 12, 2019, for Defendant to answer, move, or otherwise respond to Plaintiffs' Complaint. This is Defendant's third request for an extension, and is due to the undersigned counsel being behind on work matters after being briefly out of the office due to an automobile accident. I have conferred with Plaintiffs' counsel regarding scheduling, and this extension will not impact any other scheduled deadlines or appearances. I thank the Court for its consideration in this matter.

Dated: Garden City, New York
November 1, 2019

Respectfully Submitted,

Labonte Law Group, PLLC

By: /s/ Scott H. Mandel
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Counsel for Defendant

CERTIFICATION

I hereby certify that on November 1, 2019, a copy of the foregoing **Motion for Extension of Time to File an Answer** was electronically filed and served via CM/ECF to all counsel of record.

By: /s/ Scott H. Mandel
Scott H. Mandel, Esq.